

U.S. Department of Justice

Washington, DC 20530

Supplemental Statement**Pursuant to the Foreign Agents Registration Act of 1938, as amended**For Six Month Period Ending 10/31/2018

(Insert date)

I - REGISTRANT

1. (a) Name of Registrant

(b) Registration No.

Variable LLP

5931

(c) Business Address(es) of Registrant

600 Massachusetts Avenue NW
Washington, DC 20001

2. Has there been a change in the information previously furnished in connection with the following?

(a) If an individual:

(1) Residence address(es) Yes ☐ No ☐(2) Citizenship Yes ☐ No ☐(3) Occupation Yes ☐ No ☐

(b) If an organization:

(1) Name Yes ☐ No ☒(2) Ownership or control Yes ☐ No ☒(3) Branch offices Yes ☐ No ☒

(c) Explain fully all changes, if any, indicated in Items (a) and (b) above.

N/A

IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSE TO ITEMS 3, 4, AND 5(a).3. If you have previously filed Exhibit C¹, state whether any changes therein have occurred during this 6 month reporting period.Yes ☐No ☒

If yes, have you filed an amendment to the Exhibit C?

Yes ☐No ☐

If no, please attach the required amendment.

¹ The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, and by laws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause upon written application to the Assistant Attorney General, National Security Division, U.S. Department of Justice, Washington, DC 20530.)

4. (a) Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period?

Yes ☒ No ☐

If yes, furnish the following information:

Name	Position	Date Connection Ended
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See attachment

(b) Have any persons become partners, officers, directors or similar officials during this 6 month reporting period?

Yes ☒ No ☐

If yes, furnish the following information:

Name	Residence Address	Citizenship	Position	Date Assumed
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See attachment

5. (a) Has any person named in Item 4(b) rendered services directly in furtherance of the interests of any foreign principal?

Yes ☐ No ☒

If yes, identify each such person and describe the service rendered.

(b) During this six month reporting period, has the registrant hired as employees or in any other capacity, any persons who rendered or will render services to the registrant directly in furtherance of the interests of any foreign principal(s) in other than a clerical or secretarial, or in a related or similar capacity? Yes ☐ No ☒

Name	Residence Address	Citizenship	Position	Date Assumed
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(c) Have any employees or individuals, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period? Yes ☒ No ☐

If yes, furnish the following information:

Name	Position or Connection	Date Terminated
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Robert L. Smith II	Senior Policy Advisor	11/02/18
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(d) Have any employees or individuals, who have filed a short form registration statement, terminated their connection with any foreign principal during this 6 month reporting period? Yes ☒ No ☐

If yes, furnish the following information:

Name	Position or Connection	Foreign Principal	Date Terminated
Robert L. Smith II	Senior Policy Advisor	Embassy of the State of Qatar	11/02/18

6. Have short form registration statements been filed by all of the persons named in Items 5(a) and 5(b) of the supplemental statement?

Yes ☒ No ☐

If no, list names of persons who have not filed the required statement.

II - FOREIGN PRINCIPAL

7. Has your connection with any foreign principal ended during this 6 month reporting period? Yes ☐ No ☒
If yes, furnish the following information:

Foreign Principal

Date of Termination

8. Have you acquired any new foreign principal(s)² during this 6 month reporting period? Yes ☐ No ☒
If yes, furnish the following information:

Name and Address of Foreign Principal(s)

Date Acquired

9. In addition to those named in Items 7 and 8, if any, list foreign principal(s)² whom you continued to represent during the 6 month reporting period.

Embassy of the State of Qatar
Hong Kong Trade Development Council
Kili/Bikini/Ejit Local Government Council

10. (a) Have you filed exhibits for the newly acquired foreign principal(s), if any, listed in Item 8?

Exhibit A³ Yes ☐ No ☐Exhibit B⁴ Yes ☐ No ☐

If no, please attach the required exhibit:

- (b) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you represented during this six month period? Yes ☒ No ☐

If yes, have you filed an amendment to these exhibits? Yes ☒ No ☐

If no, please attach the required amendment.

2 The term "foreign principal" includes, in addition to those defined in Section 1(b) of the Act, an individual organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a) (9)). A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

3 The Exhibit A, which is filed on Form NSD-3, sets forth the information required to be disclosed concerning each foreign principal.

4 The Exhibit B, which is filed on Form NSD-4, sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

III - ACTIVITIES

11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 7, 8, or 9 of this statement? Yes ☒ No ☐

If yes, identify each foreign principal and describe in full detail your activities and services:

See attachment

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity⁵ as defined below? Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

See attachment

13. In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits your foreign principal(s)? Yes ☐ No ☒

If yes, describe fully.

⁵ "Political activity," as defined in Section 1(o) of the Act, means any activity that the person engaging in believes will, or that the person intends to, in any way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting or changing the domestic or foreign policies of the United States or with reference to political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

IV - FINANCIAL INFORMATION**14. (a) RECEIPTS-MONIES**

During this 6 month reporting period, have you received from any foreign principal named in Items 7, 8, or 9 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise? Yes ☒ No ☐

If no, explain why.

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.⁶

Date	From Whom	Purpose	Amount
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See attachment

Total

(b) RECEIPTS - FUNDRAISING CAMPAIGN

During this 6 month reporting period, have you received, as part of a fundraising campaign⁷, any money on behalf of any foreign principal named in Items 7, 8, or 9 of this statement? Yes ☐ No ☒

If yes, have you filed an Exhibit D⁸ to your registration? Yes ☐ No ☐

If yes, indicate the date the Exhibit D was filed. Date _____

(c) RECEIPTS-THINGS OF VALUE

During this 6 month reporting period, have you received any thing of value⁹ other than money from any foreign principal named in Items 7, 8, or 9 of this statement, or from any other source, for or in the interests of any such foreign principal?

Yes ☐ No ☒

If yes, furnish the following information:

Foreign Principal	Date Received	Thing of Value	Purpose
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N/A

6, 7 A registrant is required to file an Exhibit D if he collects or receives contributions, loans, moneys, or other things of value for a foreign principal, as part of a fundraising campaign. (See Rule 201(e)).

8 An Exhibit D, for which no printed form is provided, sets forth an account of money collected or received as a result of a fundraising campaign and transmitted for a foreign principal.

9 Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

15. (a) **DISBURSEMENTS-MONIES**

During this 6 month reporting period, have you

(1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 7, 8, or 9 of this statement? Yes ☒ No ☐(2) transmitted monies to any such foreign principal? Yes ☐ No ☒

If no, explain in full detail why there were no disbursements made on behalf of any foreign principal.

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

Date	To Whom	Purpose	Amount
See attachment			

Total

(b) DISBURSEMENTS-THINGS OF VALUE

During this 6 month reporting period, have you disposed of anything of value¹⁰ other than money in furtherance of or in connection with activities on behalf of any foreign principal named in Items 7, 8, or 9 of this statement?

Yes ☐No ☒

If yes, furnish the following information:

Date	Recipient	Foreign Principal	Thing of Value	Purpose
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(c) DISBURSEMENTS-POLITICAL CONTRIBUTIONS

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value¹¹ in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

Yes ☒No ☐

If yes, furnish the following information:

Date	Amount or Thing of Value	Political Organization or Candidate	Location of Event
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See attachment

^{10, 11} Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

V - INFORMATIONAL MATERIALS

16. (a) During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any informational materials?¹²
 Yes ☐ No ☒

If Yes, go to Item 17.

(b) If you answered No to Item 16(a), do you disseminate any material in connection with your registration?
 Yes ☐ No ☒

If Yes, please forward the materials disseminated during the six month period to the Registration Unit for review.

17. Identify each such foreign principal.

N/A

18. During this 6 month reporting period, has any foreign principal established a budget or allocated a specified sum of money to finance your activities in preparing or disseminating informational materials? Yes ☐ No ☒

If yes, identify each such foreign principal, specify amount, and indicate for what period of time.

19. During this 6 month reporting period, did your activities in preparing, disseminating or causing the dissemination of informational materials include the use of any of the following: N/A

- ☐ Radio or TV broadcasts ☐ Magazine or newspaper ☐ Motion picture films ☐ Letters or telegrams
☐ Advertising campaigns ☐ Press releases ☐ Pamphlets or other publications ☐ Lectures or speeches
☐ Other (specify) _____

Electronic Communications

- ☐ Email
☐ Website URL(s): _____
☐ Social media websites URL(s): _____
☐ Other (specify) _____

20. During this 6 month reporting period, did you disseminate or cause to be disseminated informational materials among any of the following groups: N/A

- ☐ Public officials ☐ Newspapers ☐ Libraries
☐ Legislators ☐ Editors ☐ Educational institutions
☐ Government agencies ☐ Civic groups or associations ☐ Nationality groups
☐ Other (specify) _____

21. What language was used in the informational materials: N/A

- ☐ English ☐ Other (specify) _____

22. Did you file with the Registration Unit, U.S. Department of Justice a copy of each item of such informational materials disseminated or caused to be disseminated during this 6 month reporting period? N/A Yes ☐ No ☐

23. Did you label each item of such informational materials with the statement required by Section 4(b) of the Act? N/A
 Yes ☐ No ☐

¹² The term informational materials includes any oral, visual, graphic, written, or pictorial information or matter of any kind, including that published by means of advertising, books, periodicals, newspapers, lectures, broadcasts, motion pictures, or any means or instrumentality of interstate or foreign commerce or otherwise. Informational materials disseminated by an agent of a foreign principal as part of an activity in itself exempt from registration, or an activity which by itself would not require registration, need not be filed pursuant to Section 4(b) of the Act.

VI - EXECUTION

In accordance with 28 U.S.C. § 1746, the undersigned swear(s) or affirm(s) under penalty of perjury that he/she has (they have) read the information set forth in this registration statement and the attached exhibits and that he/she is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his/her (their) knowledge and belief, except that the undersigned make(s) no representation as to truth or accuracy of the information contained in the attached Short Form Registration Statement(s), if any, insofar as such information is not within his/her (their) personal knowledge.

(Date of signature)

(Print or type name under each signature or provide electronic signature¹³)November 30, 2018/s/ Andrew BigarteSigned

¹³ This statement shall be signed by the individual agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions, if the registrant is an organization, except that the organization can, by power of attorney, authorize one or more individuals to execute this statement on its behalf.

Venable LLP (Registration No. 5931)
Supplemental Statement for Six Month Period Ending 10/31/2018

Response to 4(a)

Venable LLP has more than 250 partners. From time to time, partners or similar officials join or leave the firm.

Response to 4(b)

Venable LLP has more than 250 partners. From time to time, partners or similar officials join or leave the firm.

Response to 11 & 12

During this six-month reporting period, certain individuals who filed Short-Form Registration Statements engaged in activities for or rendered services to Foreign Principals named in Items 7, 8, or 9 of this Supplemental Statement. The following identifies each Foreign Principal and describes in detail the Short Form Registrant's activities and services performed on their behalf. Here, the Hong Kong Trade Development Council is referred to as "HKTDC," the Kili/Bikini/Ejit Local Government Council is referred to as "KBE," and the Embassy of the State of Qatar is referred to as "Qatar."

<i>Short Form Registrant</i>	<i>Foreign Principal</i>	<i>Date</i>	<i>Contact Name</i>	<i>Position</i>	<i>Type of Contact</i>	<i>Subject matter</i>
L. Aho, Legislative Assistant	Did not engage in reportable activities during this reporting period.					
J. Finestone, Senior Policy Advisor	Qatar	06/18/18	Corey Norman	Chief of Staff, Congressman John Curtis	Email	Invite Member to attend Congressional Delegation ("CODEL") in Qatar
J. Finestone, Senior Policy Advisor	Qatar	06/18/18	Chris Carter	Chief of Staff, Congressman Richard Hudson	Email	Invite Member to attend CODEL in Qatar
J. Finestone, Senior Policy Advisor	Qatar	06/18/18	Bobby Saporow	Chief of Staff, Congressman Drew Ferguson	Email	Invite Member to attend CODEL in Qatar
J. Finestone, Senior Policy Advisor	Qatar	06/18/18	Scott Luginbill	Chief of Staff, Congressman Mark Walker	Email	Invite Member to attend CODEL in Qatar
J. Finestone, Senior Policy Advisor	Qatar	06/18/18	Kyle Kizzier	Chief of Staff, Congressman Paul Mitchell	Email	Invite Member to attend CODEL in Qatar

Venable LLP (Registration No. 5931)
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Short Form Registrant	Foreign Principal	Date	Contact Name	Position	Type of Contact	Subject matter
J. Finestone, Senior Policy Advisor	Qatar	06/19/18	Kyle Kizzier	Chief of Staff, Congressman Paul Mitchell	Email	Invite Member to attend CODEL in Qatar
J. Finestone, Senior Policy Advisor	Qatar	06/19/18	John Donnelly	Chief of Staff, Congressman Tom Graves	Email	Invite Member to attend CODEL in Qatar
J. Finestone, Senior Policy Advisor	Qatar	06/20/18	Jon Oehmen	Chief of Staff, Congressman Bill Flores	Phone Call	Invite Member to attend CODEL in Qatar
J. Finestone, Senior Policy Advisor	Qatar	06/20/18	Gregory Facchiano	Chief of Staff, Congressman Lloyd Smucker	Email	Invite Member to attend CODEL in Qatar
J. Finestone, Senior Policy Advisor	Qatar	06/20/18	Kyle Kizzier	Chief of Staff, Congressman Paul Mitchell	Phone Call	Invite Member to attend CODEL in Qatar
J. Finestone, Senior Policy Advisor	Qatar	06/22/18	Scott Luginbill	Chief of Staff, Congressman Mark Walker	Email	Invite Member to attend CODEL in Qatar
J. Finestone, Senior Policy Advisor	Qatar	06/24/18	John Donnelly	Chief of Staff, Congressman Tom Graves	Email	Invite Member to attend CODEL in Qatar
J. Finestone, Senior Policy Advisor	Qatar	06/24/18	Patrick Large	Deputy Chief of Staff, Congressman Steven Palazzo	Phone Call	Invite Member to attend CODEL in Qatar
J. Finestone, Senior Policy Advisor	Qatar	06/25/18	Patrick Large	Deputy Chief of Staff, Congressman Steven Palazzo	Email	Invite Member to attend CODEL in Qatar
J. Finestone, Senior Policy Advisor	Qatar	06/25/18	Tim Baker	Chief of Staff, Congressman Rick Allen	Phone Call	Invite Member to attend CODEL in Qatar
J. Finestone, Senior Policy Advisor	Qatar	06/25/18	Bobby Saporow	Chief of Staff, Congressman Drew Ferguson	Email	Invite Member to attend CODEL in Qatar

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Short Form Registrant	Foreign Principal	Date	Contact Name	Position	Type of Contact	Subject matter
J. Finestone, Senior Policy Advisor	Qatar	06/26/18	Bobby Saparow	Chief of Staff, Congressman Drew Ferguson	Email	Invite Member to attend CODEL in Qatar
J. Finestone, Senior Policy Advisor	Qatar	06/26/18	Bruce Miller	Chief of Staff, Congressman Mark Amodei	Email	Invite Member to attend CODEL in Qatar
J. Finestone, Senior Policy Advisor	Qatar	06/26/18	Michael Hook	Chief of Staff, Congressman Chris Collins	Email	Invite Member to attend CODEL in Qatar
J. Finestone, Senior Policy Advisor	Qatar	07/02/18	Bobby Saparow	Chief of Staff, Congressman Drew Ferguson	Email	Invite Member to attend CODEL in Qatar
J. Finestone, Senior Policy Advisor	Qatar	07/10/18	Bobby Saparow	Chief of Staff, Congressman Drew Ferguson	Email	Invite Member to attend CODEL in Qatar
J. Finestone, Senior Policy Advisor	Qatar	07/10/18	Corey Norman	Chief of Staff, Congressman John Curtis	Phone Call	Invite Member to attend CODEL in Qatar
J. Finestone, Senior Policy Advisor	Qatar	07/10/18	Chris Carter	Chief of Staff, Congressman Richard Hudson	Phone Call	Invite Member to attend CODEL in Qatar
J. Finestone, Senior Policy Advisor	Qatar	07/10/18	Allan Filip	Chief of Staff, Congressman Mike Bishop	Email	Invite Member to attend CODEL in Qatar
J. Finestone, Senior Policy Advisor	Qatar	07/10/18	Scott Luginbill	Chief of Staff, Congressman Mark Walker	Phone Call	Invite Member to attend CODEL in Qatar
J. Finestone, Senior Policy Advisor	Qatar	07/10/18	Richard Laukitis	Chief of Staff, Congressman Tim Walberg	Phone Call	Invite Member to attend CODEL in Qatar
J. Finestone, Senior Policy Advisor	Qatar	10/22/18	Bobby Saparow	Chief of Staff, Congressman Drew Ferguson	Email	Follow up on invitation to CODEL to Qatar

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Short Form Registrant	Foreign Principal	Date	Contact Name	Position	Type of Contact	Subject matter
R. Smith, Senior Policy Advisor	Qatar	~6/20/18	Trent Kelly / Staff	Congressman	Unknown	Invite Member to attend CODEL in Qatar
R. Smith, Senior Policy Advisor	Qatar	~6/20/18	Bradley Byrne / Staff	Congressman	Unknown	Invite Member to attend CODEL in Qatar
R. Smith, Senior Policy Advisor	Qatar	~6/20/18	John Ratcliffe / Staff	Congressman	Unknown	Invite Member to attend CODEL in Qatar
R. Smith, Senior Policy Advisor	Qatar	~10/31/18 or 11/1/18	Unknown	Staff Member, Office of the Speaker of the House of Representatives	Unknown	Proposal for House Resolution regarding Gulf Cooperative Council
R. Hegg, Senior Policy Advisory	Did not engage in reportable activities during this reporting period.					
D. Mullon, Jr., Partner	KBE	05/02/18	Isaac Edwards	Senior Republican Counsel, Senate Committee on Energy and Natural Resources	Phone Call	Setting up meeting on 5/4/18 between Mr. Edwards and the Mayor and members of the Kili/Bikini/Ejit Local Government Council; responses to questions for the hearing record
D. Mullon, Jr., Partner	KBE	05/02/18	Isaac Edwards	Senior Republican Counsel, Senate Committee on Energy and Natural Resources	Various emails	Setting up meeting on 5/4/18 between Mr. Edwards and the Mayor and members of the Kili/Bikini/Ejit

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<i>Short Form Registrant</i>	<i>Foreign Principal</i>	<i>Date</i>	<i>Contact Name</i>	<i>Position</i>	<i>Type of Contact</i>	<i>Subject matter</i>
						Local Government Council
D. Mullon, Jr., Partner	KBE	05/02/18	Chris Fluhr	Staff Director, Subcommittee on Indian, Insular, and Alaska Native Affairs (House Committee on Natural Resources)	Phone Call	Setting up meeting on 5/4/18 between Mr. Fluhr and the Mayor and members of the Kili/Bikini/Ejit Local Government Council
D. Mullon, Jr., Partner	KBE	05/03/18	Isaac Edwards	Senior Republican Counsel, Senate Committee on Energy and Natural Resources	Phone Call	Confirming meeting on 5/4/18 between Mr. Edwards and the Mayor and members of the Kili/Bikini/Ejit Local Government Council and responding to questions for the record
D. Mullon, Jr., Partner	KBE	05/03/18	Chris Fluhr	Staff Director, Subcommittee on Indian, Insular, and Alaska Native Affairs (House Committee on Natural Resources)	Phone Call	Confirming meeting on 5/4/18 between Mr. Fluhr and the Mayor and members of the Kili/Bikini/Ejit Local Government Council
D. Mullon, Jr., Partner	KBE	05/04/18	Isaac Edwards	Senior Republican Counsel, Senate Committee on Energy and Natural Resources	Various emails	Confirming time and room number of meeting with Mayor and members of the Kili/Bikini/Ejit

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Short Form Registrant	Foreign Principal	Date	Contact Name	Position	Type of Contact	Subject matter
						Local Government Council
D. Mullon, Jr., Partner	KBE	05/04/18	Chris Fluhr	Staff Director, Subcommittee on Indian, Insular, and Alaska Native Affairs (House Committee on Natural Resources)	Email	Time for meeting on 5/4/18 between Mr. Fluhr and the Mayor and members of the Kili/Bikini/Ejit Local Government Council
D. Mullon, Jr., Partner	KBE	05/04/18	Isaac Edwards	Senior Republican Counsel, Senate Committee on Energy and Natural Resources	In-person meeting	Economic development and budget, status of S.2182
D. Mullon, Jr., Partner	KBE	05/04/18	Chris Fluhr	Staff Director, Subcommittee on Indian, Insular, and Alaska Native Affairs (House Committee on Natural Resources)	In-person meeting	Background/history of the People of Bikini; economic development; status of S. 2182
T. Quinn, Partner	Did not engage in reportable activities during this reporting period.					
B. Stupak, Partner	Did not engage in reportable activities during this reporting period.					

Response to 14(a)

The following information may relate to services and activities that do not require registration under the Foreign Agents Registration Act of 1938, as amended. Further, some of the payments may relate to services performed in a prior period. Here, the Hong Kong Trade Development Council is referred to as

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“HKTDC,” the Embassy of the State of Qatar is referred to as “Qatar,” and the Kili/Bikini/Ejit Local Government Council is referred to as “KBE.”

<i>Date</i>	<i>From Whom</i>	<i>Purpose</i>	<i>Amount</i>	<i>Total</i>
05/17/2018	HKTDC	Consultancy Services	\$21,473.00	
06/07/2018	HKTDC	Consultancy Services	\$21,473.00	
07/19/2018	HKTDC	Consultancy Services	\$21,473.00	
08/02/2018	HKTDC	Consultancy Services	\$21,473.00	
09/12/2018	HKTDC	Consultancy Services	\$21,473.00	
10/12/2018	HKTDC	Consultancy Services	\$21,473.00	
				\$128,838.00
07/30/2018	KBE	Consultancy Services	\$8,434.00	
				\$8,434.00
05/18/2018	Qatar	Consultancy Services	\$150,000 (\$25,000.00 retained by Venable for payment of services rendered)	
06/21/2018	Qatar	Consultancy Services	\$125,000 (\$25,000.00 retained by Venable for payment of services rendered)	
07/25/2018	Qatar	Consultancy Services	\$150,000 (\$25,000.00 retained by Venable for payment of services rendered)	
09/04/2018	Qatar	Consultancy Services	\$300,000 (\$25,000.00 retained by Venable for payment of services rendered)	
10/25/2018	Qatar	Consultancy Services	\$150,000 (\$25,000.00 retained by Venable for payment of services rendered)	
				\$875,000.00
			GRAND TOTAL:	
				\$1,012,272.00

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<i>Date</i>	<i>From Whom</i>	<i>Purpose</i>	<i>Amount</i>	<i>Total</i>
			(\$262,272.00 retained by Venable for payment of services rendered)	

Response to 15(a)

The following information may relate to services and activities that do not require registration under the Foreign Agents Registration Act of 1938, as amended. Further, some of the payments may relate to services performed in a prior period.

Foreign Principal: Embassy of the State of Qatar

<i>Date</i>	<i>To Whom</i>	<i>Purpose</i>	<i>Amount</i>	<i>Total</i>
5/18/2018	Husch Blackwell Strategies, LLC	Consultancy Services	\$25,000.00	
6/21/2018	Husch Blackwell Strategies, LLC	Consultancy Services	\$25,000.00	
7/25/2018	Husch Blackwell Strategies, LLC	Consultancy Services	\$25,000.00	
9/4/2018	Husch Blackwell Strategies, LLC	Consultancy Services	\$25,000.00	
10/11/2018	Husch Blackwell Strategies, LLC	Consultancy Services	\$25,000.00	
10/25/2018	Husch Blackwell Strategies, LLC	Consultancy Services	\$25,000.00	
				<i>\$150,000.00</i>
5/18/2018	Iron Bridge Strategies LLC	Consultancy Services	\$25,000.00	
6/21/2018	Iron Bridge Strategies LLC	Consultancy Services	\$25,000.00	
7/25/2018	Iron Bridge Strategies LLC	Consultancy Services	\$25,000.00	
9/4/2018	Iron Bridge Strategies LLC	Consultancy Services	\$50,000.00	
10/25/2018	Iron Bridge Strategies LLC	Consultancy Services	\$25,000.00	
				<i>\$150,000.00</i>
5/18/2018	Sphere Consulting	Consultancy Services	\$40,000.00	
6/21/2018	Sphere Consulting	Consultancy Services	\$40,000.00	
7/25/2018	Sphere Consulting	Consultancy Services	\$40,000.00	
9/4/2018	Sphere Consulting	Consultancy Services	\$80,000.00	

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<i>Date</i>	<i>To Whom</i>	<i>Purpose</i>	<i>Amount</i>	<i>Total</i>
10/25/2018	Sphere Consulting	Consultancy Services	\$40,000.00	
				\$240,000.00
			GRAND TOTAL: \$540,000.00*	

*The amount of funds received and reported on in 14(a) from the Embassy of the State of Qatar and the amount of funds disbursed and reported on behalf of the Embassy of the State of Qatar in 15(a) may not align completely because payments received or disbursed during this period may relate to services provided in prior periods or some funds received may have been held for potential future disbursements.

Response to 15(c)

Individuals who have filed Short-Form Registration Statements in connection with Venable LLP's registration under the Foreign Agents Registration Act made the following political contributions during the reporting period:

<i>Date</i>	<i>Amount</i>	<i>Political Organization or Candidate</i>
05/25/2018	\$20	VenPAC
06/26/2018	\$17.60	VenPAC
07/26/2018	\$19.60	VenPAC
08/24/2018	\$19.60	VenPAC
09/26/2018	\$19.60	VenPAC
10/26/2018	\$19.60	VenPAC
09/05/2018	\$1,000	Graves for Congress (Congressman Tom Graves)
09/18/2018	\$500	Heller for Senate (Senator Dean Heller)
10/10/2018	\$1,000	Heller for Senate (Senator Dean Heller)
10/26/2018	\$408.32	VenPAC
09/26/2018	\$408.32	VenPAC
09/18/2018	\$500	Haley Stevens for Congress (Haley Stevens)
08/24/2018	\$408.32	VenPAC
08/13/2018	\$1,920	Michigan Democratic State Central Committee
07/26/2018	\$408.32	VenPAC
06/26/2018	\$366.65	VenPAC
05/31/2018	\$250	Peters for Senate (Senator Gary Peters)
05/25/2018	\$416.66	VenPAC
08/10/2018	\$250	Jocelyn Benson for Secretary of State (Jocelyn Benson)
10/03/2018	\$250	Becerra for Attorney General (Attorney General Xavier Becerra)
06/03/2018	\$1,000	Debbie Stabenow for Senate (Senator Debbie Stabenow)
06/06/2018	\$1,000	Capuano for Congress (Congressman Mike Capuano)
06/21/2018	\$1,000	Maria Cantwell for Senate (Senator Maria Cantwell)
07/25/2018	\$1,500	Narragansett Bay PAC (Senator Jack Reed)

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07/25/2018	\$500	Menendez for Senate (Senator Bob Menendez)
07/23/2018	\$500	Sinema for Arizona (Congresswoman Kyrsten Sinema)
07/17/2018	\$500	Whitehouse for Senate (Senator Sheldon Whitehouse)
10/03/2018	\$1,000	Green Mountain PAC (Senator Patrick Leahy)
10/02/2018	\$500	Mad 4 PA PAC (Madeleine Dean)
10/14/2018	\$250	Londrigan for Congress (Betsy Londrigan)
05/25/2018	\$125	VenPAC
06/26/2018	\$110	VenPAC
07/26/2018	\$122.50	VenPAC
08/24/2018	\$122.50	VenPAC
09/26/2018	\$122.50	VenPAC
10/26/2018	\$122.50	VenPAC
09/26/2018	\$2,500	National Club Association Political Action Committee (CLUBPAC)
09/26/2018	\$1,000	Marsha for Senate (Congresswoman Marsha Blackburn)
05/25/2018	\$100	VenPAC
06/26/2018	\$88	VenPAC
07/26/2018	\$98	VenPAC
08/24/2018	\$98	VenPAC
09/26/2018	\$98	VenPAC
10/26/2018	\$98	VenPAC
Unknown	Unknown	Asa Hutchinson for Governor (Governor Asa Hutchinson)
05/25/2018	\$100	VenPAC
06/26/2018	\$88	VenPAC
07/26/2018	\$98	VenPAC
08/24/2018	\$98	VenPAC
09/26/2018	\$98	VenPAC
10/26/2018	\$98	VenPAC